

BIRMINGHAM AND SOLIHULL MENTAL HEALTH NHS FOUNDATION TRUST

BOARD OF DIRECTORS TO BE HELD ON WEDNESDAY 27 APRIL 2011

IGSG ANNUAL RETURN- INFORMATION GOVERNANCE TOOLKIT SUBMISSION

ACTION:

Provided for information on the score submitted for the annual IG submission to Connecting for Health and the plan for improvement over 2011/12.

1. EXECUTIVE SUMMARY

The Information Governance (IG) Toolkit is a mandated set of Information Governance standards and guidance for the NHS and partner organisations.

The Trust submitted a final annual score of 71% for 2010/11 and achieved a level 2 or above on all 22 key requirements.

Monitor have advised that their submission requires achieving a level 2 on all key requirements, which the Trust has, so no action is to be expected.

2. OVERVIEW OF 2011/12 SUBMISSION

There was a significant revision in the Toolkit framework for 2010/11. As a result much of the information previously used to evidence our compliance was not sufficient and significant gaps in documentation existed.

Considerable changes to policy, procedures and staff training and awareness have occurred. The final submission achieved:

- Overall Score: **71%**
- Key Requirements: **22/22 achieved a level 2 or higher**
- Non Key Requirements: **14/23 achieved a level 2 or higher.**
- Under the new toolkit rules we show as 'not satisfactory' against the assessment as we have not achieved a level 2 on all requirements.
- Breakdown of Requirement Levels:

Level	Number of Requirements (out of 45)
0	2
1	7
2	18
3	18

***IMPORTANT NOTE: Training Requirement (112)**

A level 2 was submitted for this requirement which requires by the end of June 2011, 95% of staff to have received Information Governance Training; preferably using the e-learning course(s) provided by Connecting for Health. The courses, as of mid-April, will be available through the Corporate NLMS which means automatic data entry into OLM to ensure accurate and up to date training figures.

The IG training level as at end of February 2010 is 52%; meaning there is a significant number of staff to be trained. An implementation plan is in place for this work and regular monitoring and reporting will be produced for Information Governance Steering Group (IGSG) meetings.

3. POTENTIAL FOR INVESTIGATION OF SUBMISSION

Connecting for Health state that there is potential for an organisations' submission to be audited. The audits may cover a sample section of the Information Governance Toolkit headings or could be more exhaustive. External audit firms will be used in rota and will conduct assessments based up strict guidelines and templates prepared by Department of Health- Information Governance.

Connecting for Health have stated that if an organisation does not achieve level 2 on all requirements they may require them to submit an improvement plan for the forthcoming year. This plan would need to be agreed between the Trust and CfH, and provide detail on how the organisation plans to achieve level 2 on requirements by the next annual submission. If an organisation is not deemed to be improving at the next submission, CfH will raise this at a senior level within the organisation.

An action plan for improvement throughout 2011/12 has been produced for the Trust and is being actively managed and monitored by IGSG.

4. COMPARISON WITH OTHER NHS TRUST TOOLKIT SUBMISSIONS

A comparison of the Trust submission against 6 local NHS organisations was undertaken and the following identified:

	Absolute % Score	Key Requirements below level 2	Overall Result
BSMHFT	71%	0	'Not Satisfactory'
	59%	4	'Not Satisfactory'
	59%	3	'Not Satisfactory'
	69%	2	'Not Satisfactory'
	81%	3	'Not Satisfactory'
	72%	0	'Not Satisfactory' (as did not achieve level 2 on ALL requirements)
	75%	0	'Satisfactory'

NB: The percentage score does not correlate to whether all key requirements were achieved. An organisation could have achieved a very high percentage whilst failing one of more key requirements, and two organisations could have achieved the same percentage score with one achieving all key requirements and another failing some, as they may have achieved higher levels on non-key requirements.

5. KEY AREAS FOR IMPROVEMENT FOR 2011/12

A comprehensive improvement action plan has been produced for 2011/12. The plan focuses on requirements that did not achieve a level 2, but also includes work to retain and improve scores where appropriate. (See appendix 1 for full plan).

- TRAINING (Requirement 112)- As discussed in section 2
- INFORMATION ASSET OWNERSHIP (Requirements 323, 206)

Work is on-going to implement the role of the Information Asset Owner (IAOs) and relevant reporting chains within the organisation. This is an area that needs to be further developed including:

- Identifying all Information Assets within the organisation;
- Assigning IAOs to all Information Assets;
- Ensure regular Risk Assessments and Audits are undertaken;
- Ensuring local Business Continuity Plans are in existence for assets as deemed applicable.
- Regular reporting to the Senior Information Risk Owner (SIRO)

- INFORMATION SHARING (Requirement 207)

A key area of concern is the lack of central control, awareness and safeguards over what personal data is shared externally to the Trust.

The Trust needs to:

- Hold a central register identifying sharing of personal data with external organisations (NHS and non NHS)
- Where applicable, data sharing protocols must be agreed.
- Raise awareness amongst staff that information sharing must be controlled and authorised, and managed in a secure manner.

- CORPORATE RECORDS MANAGEMENT (Requirements 601 and 604)

The Trust submitted a level 1 for the 2 requirements. Work has already taken place and will continue, with the aim of increasing these to a level 2 for the 2012 submission.

In order to achieve the project plan there needs to be a significant change in culture within the Trust in relation to Corporate Records Management, and a willingness to change. This project will be monitored through the Corporate Information Assurance Group and supervised by IGSG.

- CLINICAL CODING (Requirements 514 and 516)

The Trust submitted level 0 for these two requirements. The Trust will be instituting training for inpatient medical staff during 2011/12 to improve our performance against Clinical Coding standards.

6. CONCLUSION

The Trust is in a strong position following the work for the 2011/12 submission and the score achieved. Work needs to continue to improve performance further, particularly on requirements where a level 2 has not been achieved, to try to ensure they are up to a level 2 by the 2012 submission.

BOARD DIRECTOR SPONSOR: Chris Tidman, Deputy CEO/Executive Director of Resources

APPENDIX:

Written by:

- Director of ICT/ Deputy SIRO- James Longmore
- Information Governance Lead- Fiona Hobday

Reference:

- Connecting for Health IG Toolkit- <https://www.igt.connectingforhealth.nhs.uk/Home.aspx>